



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Mary Rose Adkins, Treasurer
NRA Political Victory Fund
11250 Waples Mill Road
Fairfax, VA 22030

Identification Number: C00053553

APR 03 2002

Reference: Year End Report (12/1/01-12/31/01)

Dear Ms. Adkins:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Commission Regulations require that a committee disclose the identification of all individuals who contribute in excess of \$200 in a calendar year. (11 CFR §104.3(a)(4)(i)) Identification for an individual is defined as the full name, mailing address, occupation and name of employer. (11 CFR §100.12) Your report discloses contributions from individuals for which the identification is not complete.

You must provide the missing information, or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information. To establish "best efforts," you must provide the Commission with a detailed description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process.

First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the requirements of federal law for the reporting of such information. (11 CFR §104.7(b)(1))

Second, if the information is not provided, you must make one follow-up,

stand alone effort to obtain this information, regardless of whether the contribution(s) was solicited or not. This effort must occur no later than 30 days after receipt of the contribution and may be in the form of a written request or an oral request documented in writing. (11 CFR § 104.7(b)(2)) The request must:

- clearly ask for the missing information, without soliciting a contribution;
- inform the contributor of the requirements of federal law for the reporting of such information, and
- if the request is written, include a pre-addressed post card or return envelope.

Third, if you receive contributor information after the contribution(s) has been reported, you shall either a) file with your next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before your next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR §104.7(b)(4))

Please provide the missing information or a detailed description of your procedures for requesting the information. For more information on demonstrating "best efforts," please refer to the Campaign Guide.

-Schedule B supporting Line 23 of your report discloses a "2001 S.C. Special Run" contribution to Joe Wilson for Congress Committee. Please be advised that South Carolina did not hold a Special-Runoff election during the 2001 South Carolina Special Election (pertinent portion attached).

If any apparently impermissible contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If you have made an impermissible contribution, you must request a refund or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR § 110.2(b) within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund or redesignation request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR § 110.1(b)

Although the Commission may take further legal action regarding this impermissible activity, your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

A response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. Electronic filers must file amendments in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Alice Kang
Reports Analyst
Reports Analysis Division

**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

PAGE 150 / 177

☐ 21b ☐ 22 ☒ 23 ☐ 24 ☐ 25
☐ 26 ☐ 27 ☐ 28a ☐ 28b ☐ 28c ☐ 29

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee

NAME OF COMMITTEE (in Full)
NRA Political Victory Fund

Full Name (Last, First, Middle Initial) A. Friends of Congressman Tim Holden		Date of Disbursement 12 / 17 / 2001	
Mailing Address P.O. Box 37		Amount of Each Disbursement this Period 500.00	
City Saint Clair	State PA	Zip Code 17970	
Purpose of Disbursement YTD: \$1,500.00		011 Category/ Type	
Candidate Name TIM HOLDEN			
Office Sought: <input checked="" type="checkbox"/> House Senate President	Disbursement For: <input checked="" type="checkbox"/> Primary General Other (specify) ▼		
State: PA District: 8	Transaction ID: 187957		

Full Name (Last, First, Middle Initial) B. Pat Toomey for Congress		Date of Disbursement 12 / 17 / 2001	
Mailing Address 2720 Jordan Road		Amount of Each Disbursement this Period 1000.00	
City Orefield	State PA	Zip Code 18069	
Purpose of Disbursement		011 Category/ Type	
Candidate Name PAT TOOMEY			
Office Sought: <input checked="" type="checkbox"/> House Senate President	Disbursement For: <input checked="" type="checkbox"/> Primary General Other (specify) ▼		
State: PA District: 15	Transaction ID: 187959		

Full Name (Last, First, Middle Initial) C. Joe Wilson For Congress Committee		Date of Disbursement 12 / 17 / 2001	
Mailing Address PO Box 5709		Amount of Each Disbursement this Period 1000.00	
City West Columbia	State SC	Zip Code 29171	
Purpose of Disbursement YTD: \$5,950.00		011 Category/ Type	
Candidate Name Joe Wilson			
Office Sought: <input checked="" type="checkbox"/> House Senate President	Disbursement For: Primary General <input checked="" type="checkbox"/> Other (specify) ▼ 2001 SC Special Run		
State: SC District: 2	Transaction ID: 187977		

SUBTOTAL of Disbursements This Page (optional) 2500.00

TOTAL This Period (last page this line number only)

